

May 2012 Update to the Five-Year Review

Salida, Colorado

## Issues & Recommendations Update

Five-Year Review Date: 9/09/2010

OU	Issue	Recommendations / Follow-up Actions	Status of Follow-up Actions
1	1) Reporting limits for four semi-volatile organics and one metal are above Action Memo limits at OU1.	Update the groundwater monitoring plan, if appropriate.	Considered but not implemented. The analytical results are protective because they are non-detects and the Method Detection Limits are below the performance standard. For dibenzo(a,h)anthracene, commercial analytical techniques currently available cannot detect this down to the performance standard.
2	2) Benzo(b)fluoranthene detected above groundwater performance standard at the OU2 Point of Compliance (POC) Spring No. 7.	Based on additional data, perform a statistical analysis on the detection. Develop a response action, if appropriate.	Complete. Annual monitoring reports dated 2/23/11, 2/29/12.
2	3) Thickness or accumulation rate of dense non-aqueous phase liquid (DNAPL) is not reported at OU2.	Revise the groundwater monitoring plan to add the requirement to monitor, sample and report the presence and/or thickness of DNAPL at all wells. Evaluate the need for an active remedy to address DNAPL within the groundwater (OU2).	Complete. Beazer monitored the presence and/or thickness of DNAPL at all wells during their November 2010 sampling event.
2	4) Discharge from Spring Nos. 3 through 6 is not monitored for volumes of water and/or DNAPL, or sampled for constituents of concern (COCs). Springs are usually dry.	Update the groundwater monitoring plan to add monitoring and sampling of Spring Nos. 3 through 6 for COCs if sufficient flow. Revise the groundwater monitoring plan to add the requirements to monitor sample and report the presence and/or flow rate of DNAPL at all springs. Evaluate the need for an active remedy to address DNAPL within the groundwater (OU2).	Considered and not implemented. EPA agreed in the Remedial Action Report, dated May 2002, that Beazer is only required to measure the flow rate, and not sample for COCs in Springs 3 and 6, and measure the flow rate of DNAPL at Spring 5. Springs 3 and 5 were dry and Spring 6 was flowing at a minuscule rate during our site visit on November 16-17, 2010, and we expect them to remain that way due to the mining activity in the area.

OU	Issue	Recommendations / Follow-up Actions	Status of Follow-up Actions
2	5) Reporting limits for polycyclic aromatic hydrocarbons (PAHS) are inconsistent with requirements of the Record of Decision (ROD) at OU2.	Update the groundwater monitoring plan if appropriate.	Considered and not implemented. Beazer is meeting the approved detection limits listed in Table 6-1 of the Remedial Action Report, dated May 2002.
1	6) Cadmium not listed as a groundwater COC at OU1.	Amend the decision documents as appropriate.	Considered and not implemented. In EPA's January 6, 2004, letter to Freeport-McMoRan Copper & Gold Inc., a groundwater performance standard for cadmium was added to the list of COCs. Freeport-McMoRan Copper & Gold Inc. has been monitoring and sampling for cadmium accordingly.
2	7) COCs from the ROD at OU2 are inconsistent with the COCs reported in the monitoring data.	Update the groundwater monitoring plan. Amend decision documents if appropriate.	Considered and not implemented. Beazer is following the approved Remedial Action Report, dated May 2002.
1,2	8) Groundwater performance standards for 2 metals and 2 PAHs are inconsistent between OU1 and OU2 Risk Assessment.	Update the groundwater monitoring plan. Determine whether the decision documents need to be updated.	Considered and not implemented. Performance standards were set at the time the decision documents were signed. EPA/CDPHE does not anticipate any impacts to protectiveness from the performance standards being different between the two OUs. Furthermore, Beazer is not required to monitor for metals.
	9) Colorado Basic Standards for Groundwater have changed for 7 PAHs.	Update the groundwater monitoring plan. Determine whether the decision documents need to be updated.	Considered and not implemented. Performance standards were set at the time the decision documents were signed. EPA/CDPHE does not anticipate any impacts to protectiveness based on the changes to the Colorado Basic Standards for Groundwater.